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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
Debtor and
Debtor in Possession.

Case No. 23-30564
Chapter 11
Date: April 4, 2024
Time: 1:30 p.m.
Location: Via ZoomGov
Judge: Hon. Dennis Montali

OMNIBUS NOTICE OF HEARING ON DEBTOR IN POSSESSION'S MOTIONS FOR:

**1. FIRST INTERIM APPLICATION OF FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES AS BANKRUPTCY COUNSEL FOR THE DEBTOR
IN POSSESSION**

**2. FIRST INTERIM APPLICATION OF SHEPPARD MULLIN RICHTER &
HAMPTON LLP FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND**

REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF AUGUST 21, 2023, THROUGH JANUARY 31, 2024

3. FIRST INTERIM APPLICATION OF WEINTRAUB TOBIN CHEDIAK COLEMAN GRODIN LAW CORPORATION FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS SPECIAL LITIGATION COUNSEL FOR THE DEBTOR IN POSSESSION

4. FIRST INTERIM APPLICATION OF WEINSTEIN & NUMBERS, LLP FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR IN POSSESSION

5. FIRST INTERIM APPLICATION OF GLASSRATNER ADVISORY & CAPITAL GROUP, LLC d/b/a B. RILEY ADVISORY SERVICES FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS FINANCIAL ADVISOR FOR THE DEBTOR

6. FIRST INTERIM APPLICATION OF OMNI AGENT SOLUTIONS, INC. FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS ADMINISTRATIVE AGENT FOR THE DEBTOR IN POSSESSION

NOTICE IS HEREBY GIVEN that The Roman Catholic Archbishop of San Francisco, debtor and debtor in possession herein (“Debtor”), has filed the above-referenced six interim applications for allowance of fees and reimbursement of expenses. These six applications (hereafter referred to collectively as the “First Interim Fee Applications”) seek entry of orders allowing fees and reimbursement of expenses described below pursuant to 11 U.S.C. §§ 330 and 331, and Fed. R. Bankr. Proc. 2016.

NOTICE IS HEREBY GIVEN that the hearing on the First Interim Fee Applications is scheduled before the Honorable Dennis Montali on April 4, 2024, at 1:30 p.m. at the United States Bankruptcy Court, Northern District of California, San Francisco Division, before the Honorable Dennis Montali (the “Hearing”). The Hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by videoconference via ZoomGov. The Bankruptcy Court’s website provides information regarding how to arrange an appearance at a video or telephonic hearing. If you have questions about how to participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website. The link to the judge’s electronic calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

NOTICE IS FURTHER GIVEN that this notice does not contain all the particulars of the First Interim Fee Applications or supporting documents, nor does it summarize all of the

1 evidence submitted in support. For further specifics concerning the Motion and the relief
2 requested, you are encouraged to review the First Interim Fee Applications and the supporting
3 evidence, including the supporting Declarations, copies of which may be obtained from the
4 website to be maintained by the Debtor's Claims Agent Omni Agent Solutions, Inc., at
5 <https://www.omniagentsolutions.com/RCASF>. You may also access these documents from the
6 Court's Pacer system (requires a subscription). The web page address for the United States
7 Bankruptcy Court for the Northern District of California is <http://www.canb.uscourts.gov>.

8 **NOTICE IS FURTHER GIVEN** that any opposition or response to the First Interim Fee
9 Applications must be in writing, filed with the Bankruptcy Court, and served on the counsel for
10 the Debtor at the above-referenced addresses so as to be received by March 21, 2024. Any
11 opposition or response must be filed and served on the Limited Service List as provided in the
12 *Final Order Granting Motion to Establish Notice Procedures and to File Confidential*
13 *Information Under Seal* at ECF No. 227. The updated Limited Service List may be obtained from
14 the Omni website listed above. Failure to file timely opposition and appear at the Hearing may
15 constitute a waiver of your objections.

16 Your rights may be affected. You should read these papers carefully and discuss them
17 with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you
18 may wish to consult one.

19 The First Interim Fee Applications are supported by the previously filed *Declaration of*
20 *Joseph J. Passarello in Support of Chapter 11 Petition and First Day Motions* filed on August 21,
21 2023, at ECF 14 ("Passarello Background Decl."), and the *Declaration of Paul E. Gaspari in*
22 *Support of Chapter 11 Petition and First Day Motions* filed on August 21, 2023 at ECF 15
23 ("Gaspari Decl.").and the additional declarations in support of each Application as described
24 below. As described in the First Interim Fee Applications, the Debtor has made substantial progress
25 in establishing the foundations for operating in chapter 11 and establishing a process for a global
26 mediation to provide a framework for a chapter 11 Plan of Reorganization. The First Interim Fee
27 Applications are described below, filed and served herewith. The titles of each of the First Interim
28 Fee Applications are followed by a summary description of the relief requested in each First Interim

Fee Application are set forth below.

I. FIRST INTERIM APPLICATION OF FELDERSTEIN FITZGERALD WILLOUGHBY PASCUZZI & RIOS LLP FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS BANKRUPTCY COUNSEL FOR THE DEBTOR IN POSSESSION

Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP (hereinafter “FFWPR”), co-bankruptcy counsel for the Debtor, submits its application (the “FFWPR Application”) for first interim allowance of fees and reimbursement of expenses for the period of August 21, 2023 (the “Petition Date”), through and including January 31, 2024 (the “Application Period”) as set forth in the Request for Relief below. In support of the FFWPR Application, FFWPR relies on the *Declaration of Paul J. Pascuzzi* filed in support of the FFWPR Application, the *Declaration of Fr. Patrick Summerhays* and the pleadings and papers on file in this case, and on such other evidence and argument as may be submitted before or during the Hearing.

Through the FFWPR Application, FFWPR requests an Order:

1. Approving on an interim basis FFWPR’s fees in the amount of \$311,527.00 and reimbursement of expenses in the amount of \$3,323.39 for a total of \$314,850.39 incurred during the Application Period, and
2. Authorizing payment to FFWPR by the Debtor of the unpaid balance of the allowed fees and expenses after application of any retainer.

II. FIRST INTERIM APPLICATION OF SHEPPARD MULLIN RICHTER & HAMPTON LLP FOR ALLOWANCE FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF AUGUST 21, 2023, THROUGH JANUARY 31, 2024

Sheppard Mullin Richter & Hampton LLP (hereinafter “SMRH”), co-bankruptcy counsel for the Debtor, submits its application (the “SMRH Application”) for first interim allowance of fees and reimbursement of expenses for the Application Period as set forth in the Request for Relief below. In support of the SMRH Application, SMRH relies on the *Declaration of Ori Katz in Support of First Interim Fee Application of Sheppard, Mullin, Richter & Hampton LLP, for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period of August*

1 21, 2023, Through January 31, 2024 filed in support of the SMRH Application, and the pleadings
2 and papers on file in this case, and on such other evidence and argument as may be submitted before
3 or during the Hearing.

4 Through the SMRH Application, SMRH requests an Order:

5 1. Awarding and allowing interim compensation in the amount of \$816,443.60 and
6 actual and necessary expenses in the amount of \$5,679.51 for total allowance in the amount of
7 \$822,123.11;

8 2. Approving and ratifying amounts paid by the Debtors to Sheppard Mullin to date in
9 the aggregate amount of to \$271,315.95 on account of the Interim Monthly Fee Statements, which
10 amount accounts for reimbursement of 100% of expenses incurred and 80% of fees earned during
11 the Application Period;

12 3. Authorizing Sheppard Mullin to draw down on amounts paid by the Debtor on
13 account of the Interim Monthly Fee Statements but currently are held in trust;

14 4. Authorizing the Debtor to pay to Sheppard Mullin the balance due on account of
15 fees awarded and allowed and reimbursement of expenses incurred as allowed and approved by the
16 Court,

17 5. Granting such other relief that the Court deems just and proper.

18 **III. FIRST INTERIM APPLICATION OF WEINTRAUB TOBIN CHEDIAK**
19 **COLEMAN GRODIN LAW CORPORATION FOR ALLOWANCE OF**
20 **FEES AND REIMBURSEMENT OF EXPENSES AS SPECIAL**
LITIGATION COUNSEL FOR THE DEBTOR IN POSSESSION

21 Weintraub Tobin Chediak Coleman Grodin Law Corporation, (hereinafter "Weintraub"),
22 special corporate and litigation attorneys for the Debtor, submits its application (the "Weintraub
23 Application") for first interim allowance of fees and reimbursement of expenses for the Application
24 Period as set forth in the Request for Relief below. In support of the Weintraub Application,
25 Weintraub relies on the *Declaration of Paul E. Gaspari* filed in support of the Weintraub
26 Application, the *Declaration of Fr. Patrick Summerhays* and the pleadings and papers on file in
27 this case, and on such other evidence and argument as may be submitted before or during the
28 Hearing.

1 Through the Weintraub Application, Weintraub requests an Order:

2 1. Approving on an interim basis Weintraub's fees in the amount of \$58,035.00 and
3 reimbursement of expenses in the amount of \$21,968.44 for a total of \$80,003.44 incurred during
4 the Application Period, and

5 2. Authorizing payment to Weintraub by the Debtor of the unpaid balance of the
6 allowed fees and expenses after application of any retainer.

7 **IV. FIRST INTERIM APPLICATION OF WEINSTEIN & NUMBERS, LLP**
8 **FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES**
9 **AS SPECIAL INSURANCE COUNSEL FOR THE DEBTOR IN**
10 **POSSESSION**

11 Weinstein & Numbers, LLP (hereinafter "W&N"), special corporate and litigation attorneys
12 for the Debtor, submits its application (the "W&N Application") for first interim allowance of fees
13 and reimbursement of expenses for the Application Period as set forth in the Request for Relief
14 below. In support of the W&N Application, W&N relies on the *Declaration of Barron Weinstein*
15 filed in support of the W&N Application, the *Declaration of Fr. Patrick Summerhays* and the
16 pleadings and papers on file in this case, and on such other evidence and argument as may be
17 submitted before or during the Hearing.

18 Through the W&N Application, W&N requests an Order:

19 1. Approving on an interim basis W&N's fees in the amount of \$95,475.50 and
20 reimbursement of expenses in the amount of \$64.07 for a total of \$95,539.57 incurred during the
21 Application Period, and

22 2. Authorizing payment to W&N by the Debtor of the unpaid balance of the allowed
23 fees and expenses after application of any retainer.

24 **V. FIRST INTERIM APPLICATION OF GLASSRATNER ADVISORY &**
25 **CAPITAL GROUP, LLC d/b/a B. RILEY ADVISORY SERVICES FOR**
26 **ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS**
27 **FINANCIAL ADVISOR FOR THE DEBTOR**

28 GlassRatner Advisory & Capital Group, LLC d/b/a B. Riley Advisory Services, (hereinafter
"B. Riley"), financial advisor for the Debtor, submits its application (the "B. Riley Application")
for first interim allowance of fees and reimbursement of expenses for the Application Period as set

1 forth in the Request for Relief below. In support of the B. Riley Application, B. Riley relies on the
2 *Declaration of Wayne P. Weitz* filed in support of the B. Riley Application, the *Declaration of Fr.*
3 *Patrick Summerhays* and the pleadings and papers on file in this case, and on such other evidence
4 and argument as may be submitted before or during the Hearing.

5 Through the B. Riley Application, B. Riley requests an Order:

6 1. Approving on an interim basis B. Riley's fees in the amount of \$449,209.75 and
7 reimbursement of expenses in the amount of \$12,864.01 for a total of \$462,073.76 incurred during
8 the Application Period, and

9 2. Authorizing payment to B. Riley by the Debtor of the unpaid balance of the allowed
10 fees and expenses after application of any retainer.

11 **VI. FIRST INTERIM APPLICATION OF OMNI AGENT SOLUTIONS, INC.**
12 **FOR ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES**
AS ADMINISTRATIVE AGENT FOR THE DEBTOR IN POSSESSION

13 Omni Agent Solutions, Inc., (hereinafter "Omni"), pursuant to 11 U.S.C. §§ 105(a), 330,
14 and 331, and the *Order Establishing Procedures and Authorizing Payment of Professional Fees*
15 *and Expenses on a Monthly Basis* [ECF 212], and the *Order (I) Authorizing and Approving the*
16 *Appointment of Omni Agent Solutions, Inc. as Claims and Noticing Agent, and (II) Granting*
17 *Related Relief* [ECF 37], submits its first fee application (the "Omni Application")¹ seeking interim
18 approval and allowance of compensation and reimbursement of expenses incurred as administrative
19 advisor to the Debtor for the Application Period as set forth in the Request for Relief below. In
20 support of the Omni Application, Omni relies on the *Declaration of Paul H. Deutch* filed in support
21 of the Omni Application, the *Declaration of Fr. Patrick Summerhays* and the pleadings and papers
22 on file in this case, and on such other evidence and argument as may be submitted before or during
23 the hearing on the Omni Application.

24 Through the Omni Application, Omni requests an Order:

25 1. Approving on an interim basis Omni's fees in the amount of \$23,323.50 Omni did
26 not incur any expenses as administrative advisor in connection with its Administrative Advisor
27

28 ¹ Capitalized terms not otherwise defined in this section VI of this notice shall have the same meanings ascribed to them in the Omni Application.

1 Services to the Debtor during the Application Period, and

2 2. Authorizing payment to Omni by the Debtor of the unpaid balance of the allowed
3 fees and expenses after application of any retainer.

4 Dated: February 28, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

6 By: /s/ Paul J. Pascuzzi
7 PAUL J. PASCUZZI
8 JASON E. RIOS
9 THOMAS R. PHINNEY

Attorneys for The Roman Catholic Archbishop of
San Francisco

10 Dated: February 28, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

12 By: /s/ Ori Katz
13 ORI KATZ
14 ALAN H. MARTIN

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